

UNITED STATES DISTRICT COURT

DISTRICT OF NEW HAMPSHIRE

Civil No. 1:20-cv-00517-PB

William S. Justice (aka) William Soler, Jr., PLAINTIFF

v.

Christopher T. Sununu, et al.,

DEFENDANTS

Tuesday, January 21, 2025

MOTION FOR ADVERSE INFERENCE TREATMENT BECAUSE OF DEFENDANTS' FAILURE TO PRODUCE VIDEO

On January, in the year 2020, there was a conference between the Plaintiff (and his parents, and his former guardian/current advisor, Wanda J. Duryea) and the Defendants (SPU staff and NH Attorney General rep) at the SPU (Secure Psychiatric Unit) patients' visitors room. At this conference, the Plaintiff (Mr. Justice) made it clear to Captain Marshall (SPU staff) in the open room, which was audible to all participants, that the Plaintiff wanted Marshall to preserve the audio/video recordings of the 7 incidents that are part of the lawsuit complaint, since the Plaintiff informed Marshall, at this conference, that the Plaintiff intended on filing a lawsuit against the prison, sometime in the future.

Years later, when the issue of the Defendants providing the Plaintiff with HONEST Discovery, the Defense claimed that the audio/video Discovery (EVIDENCE) was UNavailable. This is a typical response for SPU staff in cases of abuse against a patient, such as Mr. Justice (this according to other patients/inmates). This probable underhandedness should be held against the Defendants as spoliation of evidence.

Finally, the remedy that this Plaintiff seeks from this HONORABLE Court is that they treat the Defendants as shady individuals and grant the Plaintiff the adverse inference ruling. Thank you, and may God BLESS this HONORABLE Court.

William S. Justice

William S. Justice 01/21/25 (Tues.)

C: Catherine A. Denny, esq.; Wanda J. Duryea

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